

DAYLE ELIESON
United States Attorney
ALEXANDRA MICHAEL
NADIA AHMED
Assistant United States Attorneys
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-5087
nadia.ahmed@usdoj.gov
Alexandra.m.michael@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

BOBBY THOMPSON and
RANDY HUMPHREY,

Defendants.

2:17-mj-00947-PAL

Stipulation to Continue the
Preliminary Hearing
(Sixth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between DAYLE ELIESON, United States Attorney, and ALEXANDRA MICHAEL AND NADIA AHMED, Assistant United States Attorneys, counsel for the United States of America, and Nicholas Wooldridge, Esq., counsel for Defendant BOBBY THOMPSON, and Brian Smith, Esq., counsel for defendant RANDY HUMPHREY, that the preliminary hearing date in the above-captioned matter, currently scheduled for June 18, 2018, at 4:00 p.m., be vacated and continued for thirty (30) days, to a date and time to be set by this

1 Honorable Court.

2 This stipulation is entered into for the following reasons:

3 1. Defendant Humphrey has entered into a formal plea agreement with the
4 United States. The plea agreement has been signed and has been submitted to the Court
5 so that a change of plea hearing may be set.

6 2. Defendant Thompson intends to enter into a written, formal plea
7 agreement but his counsel Nicholas Wooldrige, Esq., was out of the District this week
8 and needs additional time to get the plea agreement signed. Defendant Thompson has
9 signed a waiver of indictment in anticipation of executing the formal plea agreement.

10 3. All parties agree to the continuance.

11 4. The defendants are currently detained pending trial but do not object to a
12 continuance.

13 5. Denial of this request for continuance could result in a miscarriage of
14 justice.

15 6. The additional time requested herein is not sought for purposes of delay,
16 but to allow for both Defendant Humphrey and Defendant Thompson to enter their pleas
17 consistent with their respective signed plea agreements.

18 7. The additional time requested by this stipulation, is allowed, with the
19 defendants' consent under the Federal Rules of Procedure 5.1(d).

20 8. The Court previously indicated that no further extensions would be
21 allowed. ECF No. 35. However, the parties hereby request that the Court allow one
22 additional extension for procedural purposes so that the change of plea hearings may
23 take place thereby resolving the case pre-indictment and obviating the need for a
24

1 preliminary hearing.

2 9. This is the sixth request for a continuation of the preliminary hearing for
3 both Defendants.

4 DATED this ____th day of June, 2018.

5 Respectfully submitted,

6 **For the Defendants:**

For the United States:

7
8 //s//
NICHOLAS WOOLRIDGE, ESQ.
9 Counsel for Defendant - Thompson

DAYLE ELIESON
United States Attorney
//s//
ALEXANDRA MICHAEL
NADIA AHMED
Assistant United States Attorneys

10
11 //s//
BRIAN SMITH, ESQ.
12 Counsel for Defendant – Humphrey

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

2:17-mj-00947-PAL

Plaintiff,

vs.

ORDER

BOBBY THOMPSON and
RANDY HUMPHREY,

Defendants.

Based on the pending Stipulation of counsel, and good cause appearing
therefore, the Court finds that:

1. Defendant Humphrey has entered into a formal plea agreement with the
United States. The plea agreement has been signed and has been submitted to the Court
so that a change of plea hearing may be set.

2. Defendant Thompson intends to enter into a written, formal plea
agreement but his counsel Nicholas Wooldrige, Esq., was out of the District
this week and needs additional time to get the plea agreement signed.
Defendant Thompson has signed a waiver of indictment in anticipation of
executing the formal plea agreement.

3. All parties agree to the continuance.

4. The defendants are currently detained pending trial but do not object to a
continuance.

5. Denial of this request for continuance could result in a miscarriage of

1 The continuance sought herein is allowed, with the defendants' consent, pursuant
2 to Federal Rules of Procedure 5.1(d).

3 **ORDER**

4 IT IS THEREFORE ORDERED that the preliminary hearing currently
5 scheduled for June 18, 2018, at the hour of 4:00 p.m., be vacated and continued to
6 July 18, 2018, at the hour of 4:00 p.m.

7 DATED this 18th day of June, 2018.

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9 
10 THE HONORABLE PEGGY A. LEEN
11 UNITED STATES MAGISTRATE JUDGE
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